



July 17, 2017

*UPS Tracking #1ZA879640193418744*

Susannah Carpenter  
Assistant Secretary and Chief Financial Officer  
West Virginia Department of Administration  
1900 Kanawha Boulevard, East  
Building 1, Room E-119  
Charleston, WV 25305-0120

**RE: Bluefield State College - Request for Reconsideration of Past Performance**  
**OPE ID: 00380900**

Dear Ms. Carpenter:

This letter is in response to the March 27, 2017 letter submitted to the U.S. Department of Education (Department's) Philadelphia School Participation Division (SPD) that requested the Department reconsider the requirement that all public West Virginia Title IV participating schools be placed on HCM1 and be provisionally certified for a period of 5 years for its failure of the "past performance" financial responsibility regulations pursuant to 34 C.F.R. 668.174(a)(3). *The Department recognizes that Bluefield State College (BSC) is the designated school that covers single audits for all public West Virginia Title IV participating schools.*

According to the Department's records, BSC's fiscal year end June 30, 2016 annual compliance and financial statements were due to the Department by March 31, 2017. The annual compliance audit and financial statements were received and accepted by the Department on May 22, 2017. This was the third annual submission to be submitted late. Failing to submit a timely annual audit submission constitutes a failure of financial responsibility under the Department's regulations.

The letter from the State of West Virginia, Department of Administration, indicates that the delayed submission BSC's fiscal year end June 30, 2016 annual compliance and financial statements submission was due to complications in completing its Comprehensive Annual Financial Report (CAFR). The letter noted that the completion of BSC's Single Audit could not be completed until the CAFR was finalized. The CAFR requires financial data from all of the state agencies and the delay was due to the state agencies not providing the data timely. As a result, the West Virginia Legislature has proposed legislation that would require all state agencies to submit financial information annually by October 31st.

**Federal Student Aid**

AN OFFICE OF THE U.S. DEPARTMENT OF EDUCATION

Federal Student Aid School Participation Division (SPD) (100)  
100 East Square East, Suite 311  
Philadelphia, PA 19107  
Studentaid.gov

Bluefield State College

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The Department has considered the explanation provided by the State of West Virginia on behalf of BSC. However, the failure to submit an acceptable complete audit and audited financial statements by the due date is a serious violation. This is the third annual submission that is late. BSC's request for reconsideration of its provisional status, and heightened cash monitoring is denied. As a result of this denial, BSC and all of the West Virginia public schools participating in Title IV will be placed on provisional certification, and heightened cash monitoring for a minimum of five years.

If you have any questions regarding this matter, please contact Terry McKenzie at (202) 377-4212.

Sincerely,

for Sherie Bell

Nancy P. Gifford  
Division Director